

CLERK OF DISTRICT COURT
NORTHERN DIST. OF TX
FORT WORTH DIVISION
FILED

2020 AUG 31 PM 2:20

RHEONDA J. LEARY

Plaintiff

v.

DISCOVER FINANCIAL SERVICES

Defendant

DEPUTY CLERK MW

4-20CV-979-P

Civil Action No.

COMPLAINT

Please see the attached documents.

* Attach additional pages as needed.

Date	08/25/2020
Signature	s/ Rheonda Leary
Print Name	Rheonda Leary
Address	6260 Skysail Road
City, State, Zip	Fort Worth, TX 76179
Telephone	(225) 241 - 4300

CLERK OF DISTRICT COURT
NORTHERN DIST. OF TX
FORT WORTH DIVISION
FILED

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DIVISION 4

2020 AUG 31 PM 2:20

CASE NO. **4-20CV-979-P**

DEPUTY CLERK MW

RHEONDA J. LEARY,
Plaintiff,

v.

DISCOVER FINANCIAL SERVICES.

Defendant.

IN THE U.S. DISTRICT COURT
DIVISION 4, PLACE OF
TARRANT COUNTY, TEXAS

DEMAND FOR JURY TRIAL

COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

The Plaintiff brings action for damages upon the Defendant's violation of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S. Code §1692 et seq., and the Telephone Consumer Protection Act ("TCPA") under 47 U.S.C. § 227 et seq. Plaintiff seeks to recover statutory damages, actual damages, punitive damages, and costs.

PARTIES

Plaintiff is RHEONDA J. LEARY a 35 year old natural person, residing in Fort Worth, Texas which lies within Tarrant County, Texas.

Defendant is DISCOVER FINANCIAL SERVICES, whose headquarters is located at 2500 Lake Cook Road, Riverwoods, Illinois 60015-3851; with an Executive Office of Customer Advocacy at P.O. Box 17019 Wilmington, Delaware 19850-7019. The Defendant's products and services include credit cards, banking, personal loans, student loans, home equity loans, and extends into the debt consolidation, debt collection, and other financial services. The State of Texas is included within the Defendant's servicing area.

VENUE

1. Venue is proper in this Court because Tarrant County, Texas is where Defendant conducts business and a substantial portion of the events or omissions giving rise to the claims occurred within the County.

FACTS SUPPORTING CAUSES OF ACTION

2. The action arises out of Defendant's attempts to collect upon purported past due credit card bills ("subject debts") said to be owed by Plaintiff.
3. In August 2019, Plaintiff began receiving calls to her cellular phone, (225) XXX-4300, from Defendant.
4. At all times relevant to the instant action, Plaintiff was the sole subscriber, owner, and operator of the cellular phone ending in 4300. Plaintiff is and always has been financially responsible for the cellular phone and its services.
5. Defendant uses as many as 12 different phone number when calling Plaintiff's cellular phone, including but not limited to (385) 261-7114 and (614) 758-2308. As well as, blocked telephone numbers which display as "No Caller ID" or "Unknown" on the cellular phone screen.
6. Upon information and belief, the above referenced telephone numbers are regularly utilized by Defendant during its debt collection activities.
7. On unanswered calls from the Defendant, Plaintiff is left a prerecorded voice message asking that she return Defendant's phone calls.
8. On answered calls from the Defendant, Plaintiff experiences a noticeable pause, listing several seconds in length, before a live representative begins to speak.
9. Upon speaking with Defendant's representative, Plaintiff was informed that the call was an attempt to collect upon the subject debts.
10. Plaintiff was confused as to why she was being contacted by Defendant through an automated system or prerecorded messages as she had never given Defendant permission to do so.

11. Plaintiff demanded Defendant stop contacting her cellular phone during her work hours (600am through 1430pm central standard time) due to the device being heavily utilized to conduct meetings and trainings for her employment as a result of the COVID-19 worldwide pandemic. The cellular phone has also been used to provide instructional material for children forced to be homeschooled as the result COVID-19.
12. Additionally, the 4300 cellular phone number has been listed on the national "Do-Not Call" registry since June 19, 2019 and registration is attached hereto and marked as "Exhibit 1."
13. Notwithstanding Plaintiff's demands, Defendant has continued placing repeated and continuous phone calls to Plaintiff's cellular phone attempting to collect upon the subject debts up until the filing of the instant action.
14. On multiple occasions, Defendant placed upwards of seven (7) calls on the same day to Plaintiff's cellular phone and a call log is attached hereto and marked as "Exhibit 2."
15. Plaintiff has received greater than 85 calls from Defendant and not less than 35 calls since demanding they stop contacting her cellular phone.
16. Plaintiff has been unfairly and unnecessarily harassed by Defendant's actions.
17. Plaintiff has suffered concrete harm as a result of Defendant's actions, including but not limited to, invasion of privacy, aggravation that accompanies excessive telephone calls. Emotional distress, increased risk of personal injury resulting from the distraction caused by the never-ending calls, increased usage of her telephone services, loss of cellular phone capacity, diminished cellular phone functionality, decreased battery life on her cellular phone, and diminished space for data space on her cellular phone.

COUNT I

VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT

18. Plaintiff repeats and re-alleges paragraphs 1 through 17 as though fully set forth herein.
19. Plaintiff is a "consumer" as defined by 15 U.S.C. §1692a(3) of the Fair Debt Collection Practices Act ("FDCPA").

20. Defendant is a “debt collector” as defined by §1692a(6), because it regularly use the mail and/or telephone to collect, or attempt to collect, delinquent consumer accounts as indicated within the attached hereto and marked as “Exhibit 3.”
21. Defendant is engaged in the business of collecting or attempting to collect, directly or indirectly, defaulted debts owed or due or asserted to be owed or due.
22. The subject debt is a “debt” as defined by §1692a(5) as it arises out of a transaction due or asserted to be owed or due to another for personal, family, or household purposes.

a. Violations of the FDCPA §1692c(a)(1) and §1692d

23. The FDCPA, pursuant to 15 U.S.C. §1692d, prohibits a debt collector from engaging “in any conduct the natural consequence of which is to harass, oppress or abuse any person in connection with the collection of a debt.” §1692d(5) further prohibits, “causing a telephone to ring or engaging any person in telephone conversation repeatedly or continuously with intent to annoy, abuse, or harass any person at the called number.”
24. Defendant violated §1692c(a)(1) and d(5) when it repeatedly called Plaintiff after being notified to stop and after being registered on the national “Do-Not Call” registry. The behavior of systematically calling Plaintiff’s phone on a frequent basis without consent and in spite of her demands was harassing and abusive. The frequent volume of calls shows that Defendant willingly violated the law and ignored Plaintiff’s pleas with the goal of annoying and harassing her.
25. Defendant was notified by Plaintiff that its calls were not welcomed. As such, Defendant knew that its conduct was inconvenient and harassing to Plaintiff.

b. Violations of the FDCPA §1692e

26. The FDCPA, pursuant to §1692e, prohibits a debt collector from using “any false, deceptive, or misleading representation or means in connection with the collection of any debt.”
27. In addition, this section enumerates specific violations, such as:

“The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.” 15 U.S.C. §1692e(10).

28. Defendant violated §1692e(10) when it used deceptive means to collect and/or attempt to collect the subject debt. In spite of the fact the Plaintiff demanded that Defendant stop contacting her during work hours, Defendant placed repeated calls to her cellular phone via automated calls and using prerecorded messages. Instead of putting an end to this harassing behavior, Defendant placed repeated calls to Plaintiff's cellular phone in a deceptive attempt to force her to answer its calls and ultimately make a payment. Through its conduct, Defendant misleadingly represented to Plaintiff that it had the legal ability to contact her via an automated system and using prerecorded messages when it never had consent and when any such hypothetical consent has been explicitly revoked by Plaintiff's demands.

c. Violations of the FDCPA §1692f

29. The FDCPA, pursuant to 15 U.S.C. §1692f, prohibits a debt collector from using "unfair or unconscionable means to collect or attempt to collect any debt."
30. Defendant violated §1692f when it unfairly and unconscionably attempted to collect a debt by repeatedly calling Plaintiff after being notified to stop. Attempting to coerce Plaintiff into payment by placing voluminous phone calls without after Plaintiff repeatedly asked that the phone calls stop is unfair and unconscionable behavior. These means employed by Defendant only served to worry or confuse Plaintiff.

WHEREFORE, Plaintiff, RHEONDA J. LEARY, respectfully requests that this Honorable Court enter judgment in her favor as follows:

- a. Declaring that the practices complained of herein are unlawful and violate the aforementioned bodies of law;
- b. Awarding Plaintiff statutory damages of \$1,000.00 as provided under 15 U.S.C. §1692k(a)(2)(A);
- c. Awarding Plaintiff actual damages, in an amount to be determined at trial, as provided under 15 U.S.C. §1692k(a)(1)

- d. Enjoining Defendant from further contacting Plaintiff; and
- e. Awarding any other relief as this Honorable Court deems just and appropriate.

COUNT II

VIOLATIONS OF TELEPHONE CONSUMER PRACTICE ACT

- 31. Plaintiff repeats and re-alleges paragraphs 1 through 30 as though fully set forth herein.
- 32. The TCPA, pursuant to 47 U.S.C. § 227(b)(1)(iii), prohibits calling persons on their cellular phone using an automatic telephone dialing system (“ATDS”), as well as using prerecorded messages without their consent. The TCPA, under 47 U.S.C. § 227(a)(1), defines an ATDS as “equipment which has the capacity...to store or produce telephone numbers to be called, using a random or sequential number generator; and to dial such numbers.”
- 33. Defendant used an ATDS in connection with its communications directed towards Plaintiff’s cellular phone. The noticeable pause lasting several seconds in length that Plaintiff experiences during answered calls from Defendant is instructive that an ATDS is being utilized to generate the phone calls. Additionally, the nature and frequency of Defendant’s contacts, included repeated calls after being notified to stop, points to the involvement of an ATDS.
- 34. Defendant’s use of prerecorded messages further brings its phone calls within the ambit of the TCPA.
- 35. Defendant violated the TCPA by placing at least 85 calls to Plaintiff’s cellular phone using an ATDS and using prerecorded messages without her consent. At no time has Plaintiff expressly provided any entity with the authority or ability to contact her cellular phone using an ATDS or using prerecorded messages in connection with any billing issues related to the purported subject debts.
- 36. The calls placed by Defendant to Plaintiff were regarding business transactions and not for emergency purposes as defined by the TCPA under 47 U.S.C. § 227(b)(1)(A)(i).

37. Under the TCPA, pursuant to 47 U.S.C. § 227(b)(3)(B), Defendant is liable to Plaintiff for at least \$500.00 per call. Moreover, Defendant's willful and knowing violations of the TCPA should trigger this Honorable Court's ability to triple the damages to which Plaintiff is otherwise entitled to under 47 U.S.C. § 227(b)(3)(C).

WHEREFORE, Plaintiff, RHEONDA J. LEARY, respectfully requests that this Honorable Court enter judgment in her favor as follows:

- a. Declaring that the practices complained of herein are unlawful and violate the aforementioned statutes and regulations;
- b. Awarding Plaintiff damages of at least \$500.00 per call and treble damages pursuant to 47 U.S.C. § 227(b)(3)(B)&(C);
- c. Awarding Plaintiff costs;
- d. Enjoining Defendant from further contacting Plaintiff; and
- e. Awarding any other relief as this Honorable Court deems just and appropriate.

Dated: August 25, 2020

Respectfully Submitted,

s/ Rheonda Leary

Rheonda Leary
6260 Skysail Road, Fort Worth, TX 76179
(225) 241-4300
Rheonda.leary@gmail.com

IMG_4258.jpg

Exhibit 1

Select an area to comment on

From: Register@donotcall.gov Register@DonotCall.gov

Subject: National Do Not Call Registry - OPEN AND CLICK on Link to Complete Your Registration

Date: June 19, 2019 at 8:34 AM

To:

Thank you for completing the first step to register your phone number with the National Do Not Call Registry. Below is the link to complete your registration. Please click on the link to complete your registration.

Here is the link (the link will only be available once):

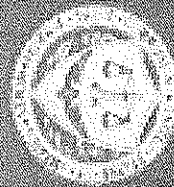
<https://www.donotcall.gov/register>

Note: you must respond to this email by clicking the link within 72 hours for your registration to be successful. If you do not click on the link, or the link does not work, use your "copy and paste" function to copy the entire link in the email into your Web browser's address bar. Once you have successfully registered, you will receive a confirmation email.

If you do not wish to be registered with the Do Not Call Registry, don't click on link. We won't register you.

Please do not reply to this message as it is from an unattended mailbox. Any replies to this email will be deleted. The contents of this email are confidential and may be subject to legal review.

Exhibit 1



FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

More Information



National Do Not Call Registry

Registration Complete

Your phone number has been registered in the National Do Not Call Registry.
You may print this page if you wish to retain a copy for your records.

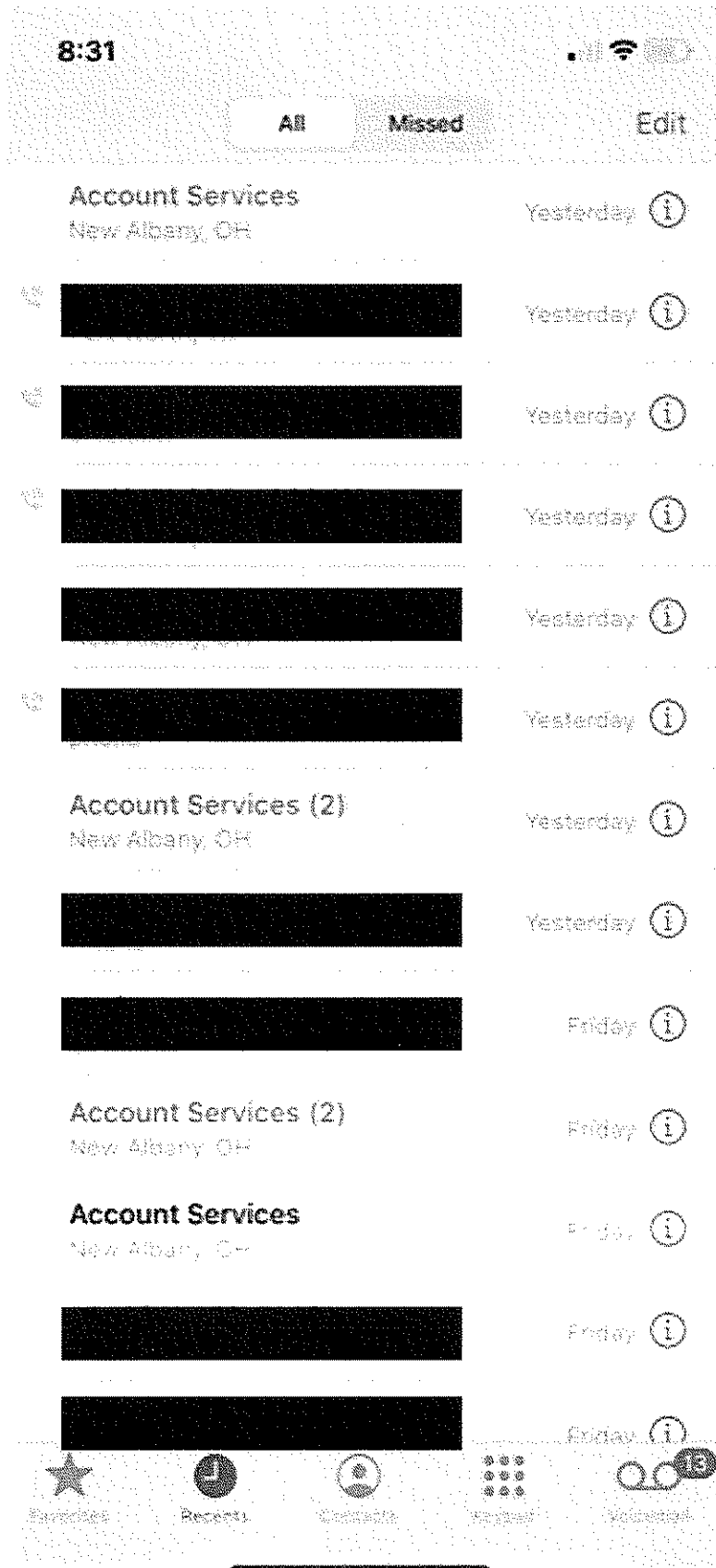


EXHIBIT 2

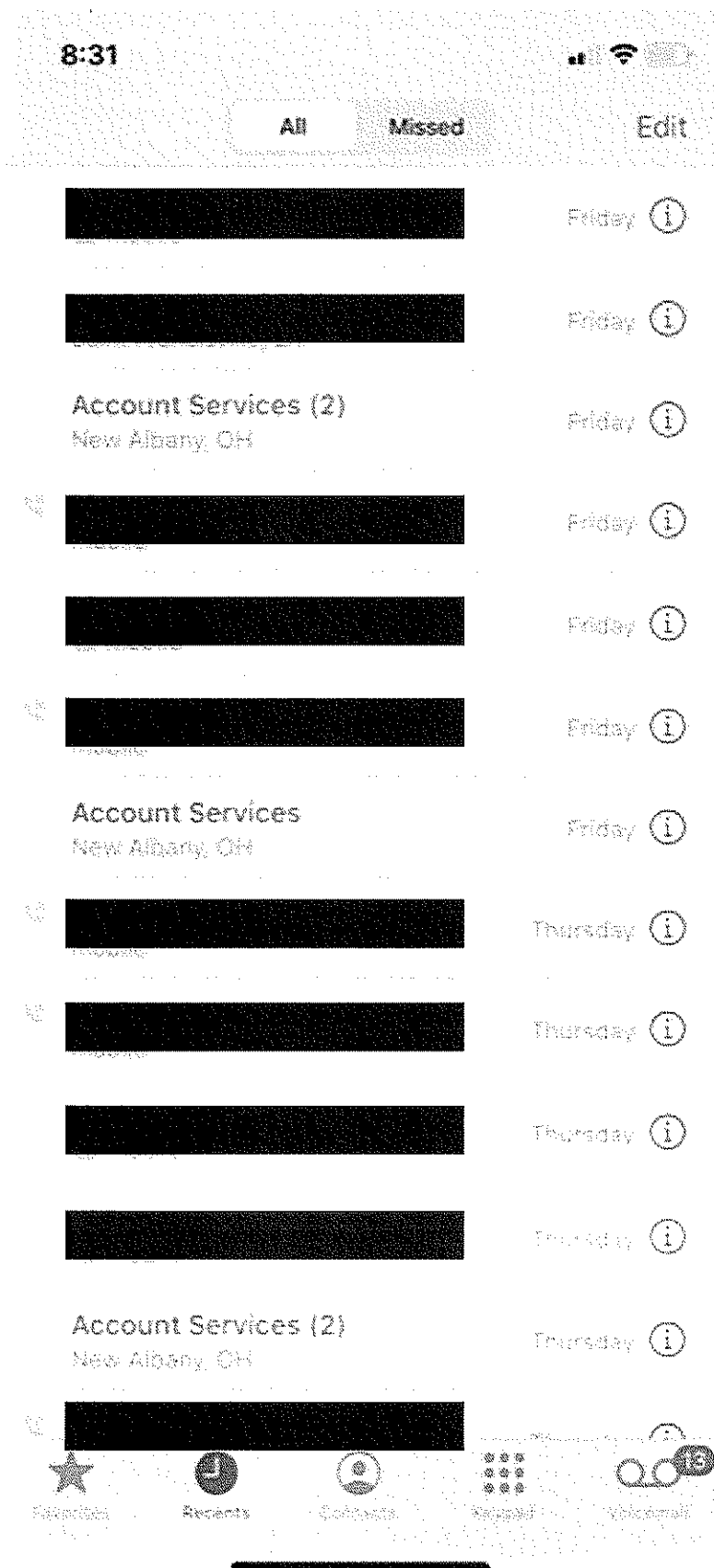


EXHIBIT 2

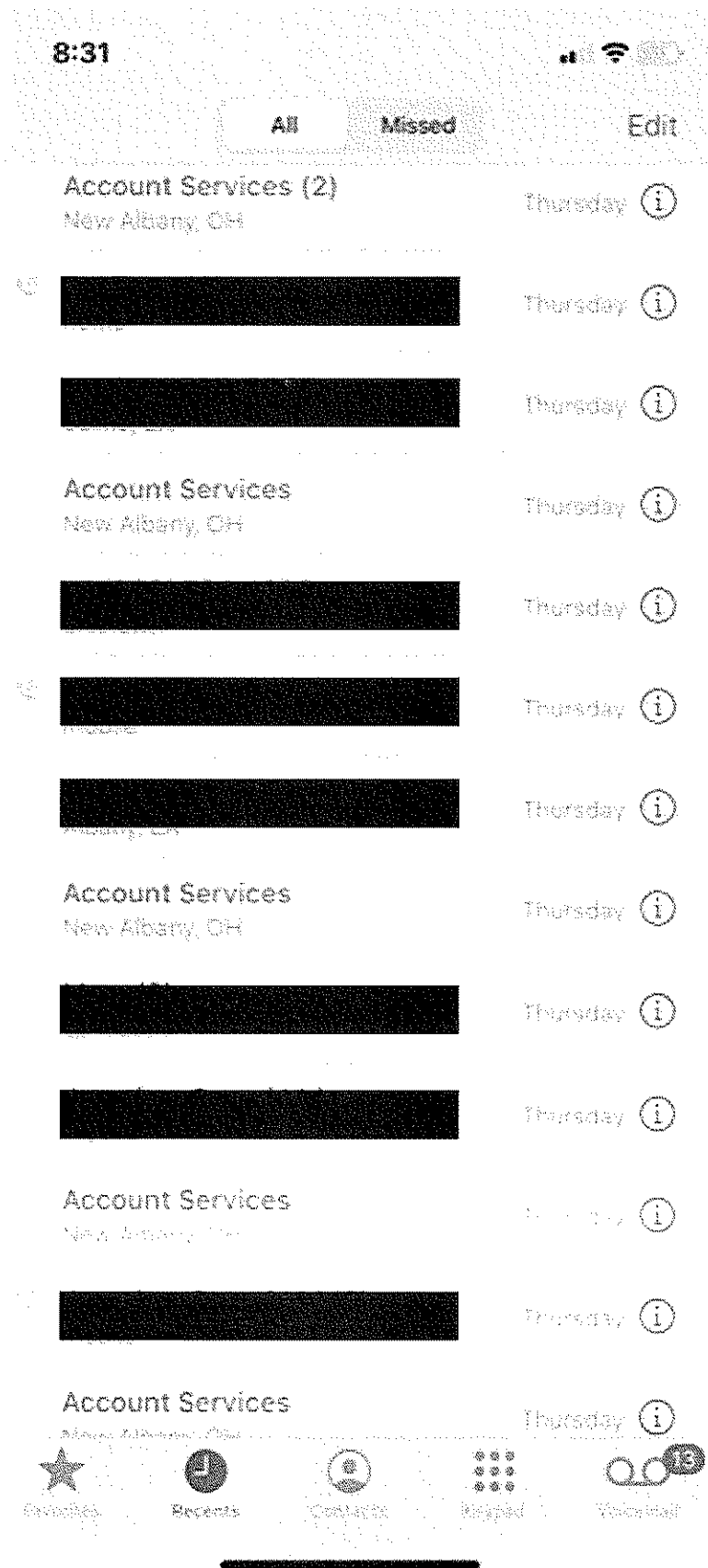


EXHIBIT 2

[illegible]

EXHIBIT 2

◀ Recents



EXHIBIT 2

Account Services

+1 (614) 758-2308

New Albany, OH



message



call



video



mail



pay

August 19, 2020

8:19 AM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

◀ Recents

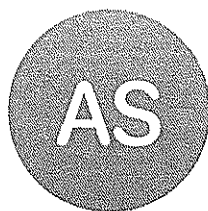


EXHIBIT 2

Account Services

+1 (614) 758-2308

New Albany, OH



message



call



video



mail



pay

August 19, 2020

8:19 AM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

◀ Recents

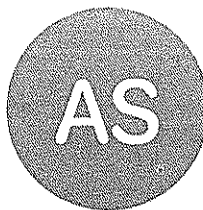


EXHIBIT 2

Account Services

+1 (614) 758-2308
New Albany, OH



message



call



video



mail



pay

August 19, 2020

9:35 AM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

◀ Recents

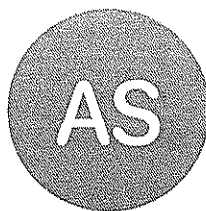


EXHIBIT 2

Account Services

+1 (614) 758-2308
New Albany, OH



August 19, 2020

10:42 AM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



◀ Recents

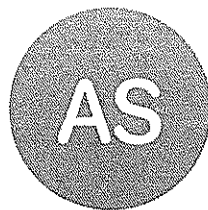


EXHIBIT 2

Account Services

+1 (614) 758-2308

New Albany, OH



message



call



voicemail



email



pay

August 19, 2020

11:59 AM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

◀ Recents

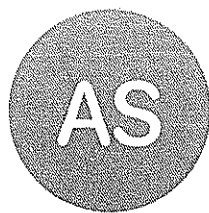


EXHIBIT 2

Account Services

+1 (614) 758-2308
New Albany, OH



message



call



video



mail



pay

August 19, 2020

1:45 PM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

◀ Recents

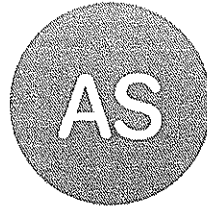


EXHIBIT 2

Account Services

+1 (614) 758-2308
New Albany, OH



message



call



video



qr



pay

August 19, 2020

4:50 PM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

◀ Recents

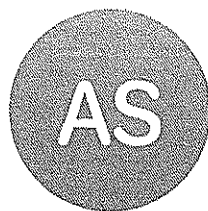


EXHIBIT 2

Account Services

+1 (614) 758-2308

New Albany, OH



message



call



video



email



pay

August 19, 2020

6:10 PM Missed Call

Share Contact

Create New Contact

Add to Existing Contact

Add to Emergency Contacts

Share My Location

Block this Caller



Favorites



Recents



Contacts



Keypad



Voicemail

**Important Account Information for Addressee Only**

1 message

Discover Card <discover@service.discover.com>
Reply-To: dontreply@service.discovercard.com

Thu, Aug 20, 2020 at 9:03 PM

EXHIBIT 3**DISCOVER**[Access My Account](#)

Account number ending in 8380

Dear Rheonda J Leary,

Your Discover® Card Account is considerably past due. We will soon report your account as Charged-Off to the credit reporting agencies, unless you take action right away.

- You can make a payment of just \$93.00 to stop the charge-off action for now. If you mail this payment with the attached coupon, keep in mind we must receive it by September 14, 2020.
- You can also pay by phone or pay online. Or call or chat with us to discuss your options. We're happy to work together to bring your account up-to-date with payments that work for you.

Reach us at **1-800-973-5095** MONDAY-FRIDAY 8:00AM TO 10:00PM, SATURDAY 8:00AM TO 12:00PM ET. Or visit **Discover.com**. We'd like to find a way to avoid reporting your account as charged-off.

Sincerely,
Cardmember Assistance, Discover Card

This is an attempt to collect a debt and any information obtained may be used for that purpose.

[Find Us on Facebook](#)[Follow Us on Twitter](#)[Read Our Blog](#)[Discover Mobile](#)

Add discover@service.discover.com to your address book to ensure delivery of these e-mails. See ways to help identify Discover e-mails by visiting our [email security](#) page.

IMPORTANT INFORMATION

EXHIBIT 3

This e-mail was sent to: [REDACTED] for account number ending with **8380**.

You are receiving this e-mail because you are a Discover Cardmember.

Please do not reply to this email as we are not able to respond to messages sent to this address.

DISCOVER and other trademarks, logos and service marks used in this e-mail are the trademarks of Discover Financial Services or their respective third-party owners.

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

RHEONDA J LEARY

DEFENDANTS

DISCOVER FINANCIAL SERVICES

(b) County of Residence of First Listed Plaintiff Tarrant

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Fair Credit Reporting Act ("FCRA") pursuant to 15 U.S.C. § 1692 et seq.Brief description of cause:
Unlawful Debt Collection Practices**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

PRESS FIRMLY TO SEAL



Reneada Leary
6260 SKYSAIL RD
FORT WORTH TX 76179

PRIORITY MAIL 1-DAY

C024 0005

P

US POSTAGE AND FEES PAID
PRIORITY MAIL
Aug 29 2020
Mailed from ZIP 76179
PM Flat Rate Env
1655401
Commercial Plus Pricing

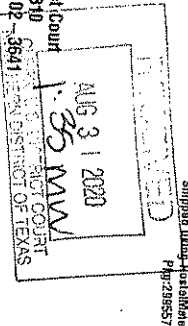


PRESS FIRMLY TO SEAL

PRIORITY MAIL
FLAT RATE ENVELOPE
POSTAGE REQUIRED

Expected delivery date specified for domestic
Most domestic shipments include up to \$50 of
USPS Tracking® included for domestic and mai
Limited international insurance.**
When used internationally, a customs declarati
Insurance does not cover certain items. For details regardin
Domestic Mail Manual at <http://pe.usps.com>.
See International Mail Manual at <http://pe.usps.com> for av

SHIP TO:
Fort Worth US District Court
501 W 10TH ST STE 310
FORT WORTH TX 76102-3641



USPS TRACKING #

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FLAT RATE ENVELOPE
ONE RATE ■ ANY WEIGHT
TRACKED ■ INSURED



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EP14F May 2020
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